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**REPLY IN SUPPORT OF EX PARTE MOTION FOR AN ORDER
EXTENDING INTERNATIONAL TRAVEL AND RETURNING HIS
PASSPORT**

The Government’s opposition to Jason Cardiff’s Ex Parte Application for an Order Extending International Travel is ill-informed and accuses counsel of filing a motion about Mr. Cardiff’s medical condition without substantiation. Ironically, AUSA Sebastian then asserts, *without substantiation*, that counsel has repeatedly misquoted sources and transcripts making dishonest statements to the court. This clearly violates the Court’s Civility and Professionalism Guidelines.¹

First, counsel did not dream up the names of the physicians identified as Mr. Cardiff's treating physicians. Moreover, counsel ignores the part of the Ex Parte Application that describes the type of medical issues being experienced by Mr. Cardiff and names of the treating physicians stating: "Counsel for Mr. Cardiff stands ready to provide the Court with the correspondence and medical records supporting this request." Dkt. 125 at 3 (emphasis supplied). Secondly, AUSA Sebastian also argues that, if electronic monitoring was removed, Mr. Cardiff would not return to the United States. The record, however, shows that Mr. Cardiff has travelled domestically and to Ireland and has complied with all court orders.

Simply stated, the unsupported allegations of dishonesty by Mr. Sebastian have are wholly irrelevant and cast serious doubt as to whether AUSA Sebastian has lost objectivity in this case.

The Court should disregard ad hominem attacks on counsel and grant the application to extend Mr. Cardiff's travel so that he can obtain the medical treatment he needs.

¹ <https://www.cacd.uscourts.gov/attorneys/admissions/civility-and-professionalism-guidelines>

1 Dated: November 15, 2024

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By: /s/ Stephen R. Cochell

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